

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALPHONSE MATTHEWS,)	
)	
Plaintiff,)	07 C 6926
)	
vs.)	Judge Kendall
)	
CITY OF CHICAGO,)	Magistrate Judge Keys
Chicago Police Officers)	
CALVIN CHATMAN, Star 5532,)	Jury Demand
JAMES ECHOLS, Star 12329,)	
HARRY MATHEOS, Star 18599, and)	
DIMITRIOSJ LAMPERIS, Star 20718,)	
)	
Defendants.)	

**DEFENDANTS' AGREED MOTION FOR EXTENSION OF TIME TO
COMPLETE DISCOVERY**

Defendant Chicago Police Officers James Echols, Calvin Chatman, Harry Matheos, and Dimitrios Lamperis, and Defendant City of Chicago ("Defendants"), by one of their attorneys, Anne K. Preston, Assistant Corporation Counsel, move this Court for an extension of time to complete fact discovery. In support of this motion, Defendants state as follows:

1. On May 14, 2008, this Court ordered that all discovery be completed by September 17, 2008.
2. The parties have worked diligently towards completing fact discovery. The parties have exchanged written discovery. Plaintiff and a witness have been deposed. Defendant Officers' depositions have been scheduled, but have not been taken yet.
3. Defendants' counsel anticipates taking at least one additional witness deposition, but has been unsuccessful in attempting to serve this witness with a subpoena; investigation continues to locate this individual.

4. The parties are not able to complete the remaining discovery prior to the September 17, 2008 discovery closure date.

5. Plaintiff's counsel has no objection to this motion for an extension of time to complete fact discovery.

6. This matter is set for trial on April 20, 2009. This request for an extension of time to complete discovery will not unduly delay the resolution of the disputed issues.

WHEREFORE, Defendants respectfully request that this Honorable Court extend fact discovery up to and including November 3, 2008.

Respectfully Submitted,

/s/ Anne K. Preston
Anne K. Preston
Assistant Corporation Counsel

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Suite 1400
Chicago, Illinois 60602
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CERTIFICATE OF SERVICE

I, Anne K. Preston, hereby certify that I have caused a true and correct copy of the above and foregoing **NOTICE OF MOTION** and **DEFENDANTS' AGREED MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY**, to be sent via e-filing to the person named in the foregoing Notice, a "Filing User" pursuant to Case Management/Electronic Case Files, on September 11, 2008, in accordance with the rules on electronic filing of documents.

/s/ Anne K. Preston
ANNE K. PRESTON
Assistant Corporation Counsel